

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA : No. 5:24-MJ-00056  
: :  
vs. : (M.J. SAPORITO)  
: :  
JULIAN DEUERLEIN, : :  
Defendant : :

**MOTION TO CONTINUE PRELIMINARY EXAMINATION**

AND NOW, the United States of America, by its undersigned counsel, submits the following Motion to Continue Preliminary Examination scheduled in this matter. In support of this motion, the United States alleges as follows:

1. On July 10, 2024, a Criminal Complaint was filed charging the defendant with 18 U.S.C. § 875(c) Interstate Threatening Communication (Doc. 1).
2. On July 12, 2024, the Defendant had an initial appearance on the Complaint.
3. A Preliminary Examination is currently scheduled for July 26, 2024. (Doc. 12).

4. The Grand Jury will not be in session on July 23, 2024, and accordingly, the Government cannot present this case until July 30, 2024.
5. Accordingly, it is respectfully submitted that the ends of justice will be served by a brief continuance of the date of the Preliminary Examination.
6. Defense counsel concurs in this Motion so long as the Preliminary Examination is not continued past August 2, 2024.

WHEREFORE, for the foregoing reasons, the Government respectfully requests that the Court grant the Motion to Continue Preliminary Examination.

Respectfully submitted,

GERARD M. KARAM  
United States Attorney

/s/ Luisa Honora Berti  
LUISA HONORA BERTI  
Assistant United States Attorney  
Office of the U.S. Attorney  
Suite 311, 235 North Washington Ave.  
Scranton, PA 18501

570-348-2800  
luisa.berti@usdoj.gov

Date: July 22, 2024

**CERTIFICATE OF CONCURRENCE**

I, Luisa Honora Berti, certify that counsel for the defendant, Brandon R. Reish, Esquire concurs in the within **MOTION TO CONTINUE PRELIMINARY EXAMINATION**, so long as the hearing is not continued past August 2, 2024.

/s/ Luisa Honora Berti  
LUISA HONORA BERTI  
Assistant United States Attorney

Date: July 22, 2024

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that she is an employee in the Office of the United States Attorney for the Middle District of Pennsylvania and is a person of such age and discretion as to be competent to serve papers.

That on July 22, 2024, she served a copy of the attached:

### **MOTION TO CONTINUE PRELIMINARY EXAMINATION**

By electronic filing upon:

Brandon R. Reish, Esquire  
Counsel for the Defendant

/s/ Donna Borgia  
DONNA BORGIA  
Legal Administrative Specialist